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Attorney for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,

Plaintiff,

v.

1. Tyler Kontos,
2. Joel Max Kupetz,
3. Jorge Kinds,

Defendant.

CR-25-00915-SMB

**BILL OF PARTICULARS FOR
FORFEITURE OF PROPERTY**

The United States of America, by and through its undersigned attorneys, and pursuant to Federal Rule of Criminal Procedure 32.2(a), particularly alleges that, in

1 addition to the assets contained in the Indictment, Doc. 1, the following property is subject
2 to forfeiture on the basis of the forfeiture allegations set forth therein:

- 3 1. 2024 GMC Sierra bearing Vehicle Identification Number (VIN)
4 1GT49ZEY4RF241984 seized from Defendant Tyler Kontos on June 30, 2025;
- 5 2. Boatmate Trailer bearing VIN 5A7BB2731ST001972 seized from Defendant Tyler
6 Kontos on June 30, 2025;
- 7 3. 2025 Pavati AL-26 bearing Hull Identification Number HIGW0161K425 seized
8 from Defendant Tyler Kontos on June 30, 2025;
- 9 4. The contents of Edward Jones Brokerage account ending in 67-1-2 held in the name
10 of Wild West Medical Consulting, LLC;
- 11 5. Approximately \$665,744.39 seized from U.S. Bank account ending in 2510 held in
12 the name of Wild West Medical Consultant, LLC;
- 13 6. Approximately \$46,390.89 seized from U.S. Bank account ending in 8255 held in
14 the name of Tyler Kontos;
- 15 7. Approximately \$27,829.17 seized from U.S. Bank account ending in 6205 held in
16 the name of Joel M. Kupetz and Karma Medical Consulting, LLC;
- 17 8. The contents of Charles Schwab brokerage account ending in 1792 held in the name
18 of Joel Kupetz; and
- 19 9. All cryptocurrency seized from Coinbase account 59e22e4317258200efe8b807
20 held in the name of Max Kupetz.

21 The United States of America also submits this notice that the government will no
22 longer seek forfeiture of certain property previously identified in the forfeiture allegations
23 contained in the Indictment: The property at 2440 East Medicine Lake Blvd., Plymouth,
24 Minnesota 55441, titled to Tyler Kontos, Legal Description: Lots 22 and 23, Block 8,
25 Rearrangement of Medicine Lake Park, Third Division, Hennepin County, Minnesota.

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1 Respectfully submitted this 20th day of August 2025,

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3 TIMOTHY COURCHaine
4 United States Attorney
District of Arizona

5 s/Matthew Williams
6 MATTHEW WILLIAMS
7 Assistant U.S. Attorney
District of Arizona

8 LORINDA LARYEA
9 Acting Chief
Criminal Division, Fraud Section
U.S. Department of Justice

10
11 By: s/Shane Butland
12 SHANE BUTLAND
13 Trial Attorney
Criminal Division, Fraud Section
U.S. Department of Justice

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22 **CERTIFICATE OF SERVICE**

23 I hereby certify that on this same date, I electronically transmitted the attached
24 document to the Clerk's Office using the CM/ECF System for filing and transmittal of a
25 Notice of Electronic Filing to the following CM/ECF registrant(s): All counsel of record.

26
27 s/Daniel Parke
28 U.S. Attorney's Office